

November 12, 2024

VIA CM/ECF

The Honorable Leda Dunn Wettre
United States Magistrate Judge
District of New Jersey
MLK Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Federal Trade Commission v. TheFBAMachine Inc. et al.*,
Civ. No. 24-06635 (JXN) (LDW)

Dear Judge Wettre,

Counsel for Plaintiff and Defendants respectfully request an extension of a deadline set in the Court's Pretrial Scheduling Order (Docket No. 90) filed on November 7. The Order sets November 29, 2024, as the deadline for propounding interrogatories and document requests. *Id.* ¶ 3. Counsel for all parties believe additional time to serve discovery would benefit the parties, by allowing them to foreground settlement discussions and, if necessary and within the limits set by the Court's Order, propound follow-up discovery requests after the receipt of responses to initial interrogatories and requests for documents. Accordingly, counsel for Plaintiff and Defendants respectfully request that the Court modify its Order to permit the parties to propound interrogatories and document requests on or before March 7, 2025.**

If the request is acceptable to the Court, counsel for Plaintiff and Defendants respectfully request that Your Honor endorse this letter "So Ordered" and have it entered on the Court's docket.

Sincerely,

s/ Frances L. Kern

Frances Kern
Colleen Robbins
Counsel for Plaintiff

s/ Alexander Susi

Mikhail Usher
Alexander Susi
*Counsel for Corporate Defendants
and Defendant Steven Rozenfeld*

cc: counsel of record (via ECF)

** Application denied. The parties shall propound initial written discovery requests on or before **January 31, 2025**.



Hon. Leda D. Wettre, U.S. Magistrate Judge
Dated: November 13, 2024